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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

Case No.: 2:24-CR-00202-JAD-BNW

VS.

Stipulation for a Protective Order

LAEL MELVIN PERKINS, ET AL.,

Defendant.

The parties, by and through the undersigned, respectfully request that the Court issue an Order protecting from disclosure to the public or any third party not directly related to this case, discovery related to an ongoing cyber investigation (the “Protected Material”). The parties state as follows:

1. On September 10, 2024, a grand jury returned an indictment charging the defendants with Conspiracy to Distribute Controlled Substances—fentanyl in violation of 21 U.S.C. §§ 846, 841(a)(1), (b)(1)(B)(vi) and Distribution of a Controlled Substance—fentanyl in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(vi). ECF No. 1.

2. The trial date is currently set for March 25, 2025. ECF No.22.

3. The government has discovery related to an ongoing cyber investigation (Protected

1 Material). The government believes that, because of the sensitive nature of the information and
2 the ongoing investigation, the Protected Material may only be provided pursuant to a protective
3 order.

4 4. In order to prevent dissemination of the Protected Material, the parties intend to
5 restrict access to the Protected Material in this case to the following individuals: attorneys for all
6 parties and any personnel that the attorneys for all parties consider necessary to assist in
7 performing the attorneys' duties in the prosecution or defense of this case, including the
8 defendants, investigators, paralegals, experts, support staff, interpreters, and any other
9 individuals specifically authorized by the Court (collectively, the "Covered Individuals").

10 5. Without leave of Court, the Covered Individuals shall not:

- 11 a. make copies for, or allow copies of any kind to be made by any other person of
12 the Protected Material in this case or permit dissemination of the Protected
13 Material, to include leaving a copy of the Protected Material at a detention
14 facility;
- 15 b. allow any other person to review the Protected Material;
- 16 c. use the Protected Material for any purpose other than preparing to defend
17 against or prosecute the charges in the indictment or any superseding
18 indictment arising out of this case; or
- 19 d. attach the Protected Material to any of the pleadings, briefs, or other court
20 filings except to the extent those pleadings, briefs, or filings are filed under seal.

21 6. Nothing in this stipulation is intended to restrict the parties' use or introduction of
22 the Protected Material as evidence at trial or support in motion practice. If the defendant proceeds
23 to trial or any evidentiary hearing, the parties will confer to determine whether the terms of this
24 stipulation should be revisited.

7. The parties shall inform any person to whom disclosure may be made pursuant to this order of the existence and terms of this Court's order.

8. The defendants hereby stipulate to this protective order.

DATED: March 3, 2025.

Respectfully submitted,

For the United States:

SUE FAHAMI
Acting United States Attorney

/s/ Edward D. Penetar
EDWARD D. PENETAR
Assistant United States Attorney

For the Defense:

/s/ William Michael Horvath
WILLIAM MICHAEL HORVATH, ESQ.
Attorney for LAEL MELVIN PERKINS

/s/ Christopher T. Rasmussen
CHRISTOPHER T. RASMUSSEN, ESQ.
Attorney for KESHAWN COX

ORDER

The Court **GRANTS** the above stipulated protective order (ECF No. 27). All motions to seal must comply with Local Rule IA 10-5 and *Kamakana v. City & Cnty. of Honolulu*, 447 F.3d 1172 (9th Cir. 2006). **IT IS SO ORDERED.**

UNITED STATES MAGISTRATE JUDGE

DATED: March 4, 2025